

## Modern Slavery Statement for Whites Group – Year ended 30 June 2022

Whites Group (ABN 25 008 645) is a wholesaler and manufacturer of hardware, rural and industrial goods. It operates six distribution centres across Australia and a manufacturing plant in Albury NSW. Whites Group sells products to a diverse range of resellers across Australia. Our supply chain network includes both our own facility and in excess of 50 factories primarily in China, Vietnam and Spain. Raw materials generally also originate in these countries.

In November 2021, Whites Group acquired Design Flow (ABN 16 098 602 790), a plastic manufacturing business, who primarily source raw material locally, but do purchase some imported finished products from China. We have incorporated the Whites Group modern slavery risk assessment and commitment into the Design Flow business.

Whites Group is owned by Tolranga Pty Ltd which acts only as a holding company and does not have any outward facing operations.

Whites Group opposes modern slavery and in this statement outlines our approach to minimising the risk of modern slavery in our business or its supply chains.

### Governance of Modern Slavery

Whites Group has set up a number of measures in respect to modern slavery:

**a) Supplier Code of Conduct**

Whites Group has developed a Supplier Code of Conduct which sets out clear parameters as to the expectations and requirements of suppliers which includes framework regarding Modern Slavery.

**b) Audit system**

Our key suppliers (Tier 1) are subject to external audits by accredited agencies such as SEDEX and BSCI to ensure compliance with our policy and legislation. Other suppliers (Tier 2) are subject to internal audits conducted by our partner China Office to ensure compliance to the policy.

**c) Training**

The Executive and the Directors of Whites Group have received training in the legislation and Whites policy with respect to Modern Slavery. Whites Group has revised the employee code of conduct to include reference to Modern Slavery.

### Monitoring of Modern Slavery ongoing

Whites Group has set up the following steps to monitor the effectiveness of governance

- Review of audits from suppliers and appropriate follows ups
- Spot checks on suppliers with physical visits either by Whites staff or our partner China Office
- Regular communications and reviews with suppliers, including a commitment to the Whites Group Supplier Code of Conduct

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2148

**SYDNEY**

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**TOWNSVILLE**

13 Crocodile Crescent  
Bohle QLD 4818

**ADELAIDE**

18 Bradford Way  
Cavan SA 5094

**PERTH**

53 Collopy Road Perth  
Airport WA 6105



## FY2022 Risk Assessment

During this reporting period we analysed our Supply Chain to identify any modern slavery related risks. A risk register for all of our suppliers was established in FY2021 and continues to be assessed every 12 months. Through our ongoing assessment, we identified areas with the lowest risk, such as local operations handled by staff employed by Whites Group, and also large overseas operations that have been certified by accredited agencies (Tier 1 suppliers). Any risks such to WHS, Ethical Operating Practices, Human Rights and Diversity are minor for these two level of suppliers.

The majority of our remaining overseas operations are constantly reviewed by employees with our China Regional Office and also an internal audit process (Tier 2 suppliers). We believe risk here is minor, although we are committed to reducing any modern slavery risks within our Supply Chain, so have set targets to help achieve this. Design Flow's imported suppliers are also managed by our China Office, and also included in our risk assessment. These factories are now subject to the same internal audit process and ongoing review As Whites group Tier 2 suppliers.

Less than 3% of our supply chain are now in our tertiary level of Suppliers, where we have limited interaction and presence, but continue to monitor through our supply network.

## Our Commitment

We have an ongoing and evolving process to address any modern slavery risks. We set ourselves annual goals which are reviewed throughout the year to assess our effectiveness of our approach and course correct where required. We are aiming to move one factory from Tier 2 to Tier 1 each calendar year where applicable to further reduce any modern slavery risks.

This Modern Slavery Statement covers Whites Group (including Design Flow) and its holding company Tolranga Pty Ltd.

The Directors of Whites Group and Tolranga have a strong intent to combat Modern Slavery in all its forms and are committed to meeting our obligations under the Australian Modern Day Slavery Act 2018.

This statement was approved by the Board of Whites Group and its holding company Tolranga on the 2<sup>nd</sup> December, 2022.

Michael Kelly - C.E.O.  
Whites Group Pty Ltd

Date 8 / 12 / 2022

Michael Kelly - Director  
Whites Group Pty Ltd

Date 8 / 12 / 2022

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